

I am an active amateur radio operator, who uses the 160 meter amateur band in what would be considered an “episodic” manner, primarily during “contest” operating events as described in the petition, using both CW and SSB.

The petition to limit “wide band”, i.e. SSB, operation in the 1800 – 1843 KHz segment suffers from a serious flaw. Under this petition and the ARRL Band Plan used as the model, CW operation is specifically permitted above 1843 KHz during periods of high usage or emergencies. There is no reciprocal permission for SSB usage below 1843 KHz during similar conditions of high usage or emergencies.

Such flexibility has worked well during SSB operating events. In practice most contest operation, CW or SSB, takes place below about 1845 KHz, regardless of mode. (Although this is not true for 3 weekends per year when there are contests exclusively for 160 meter operation. These events may occupy 75 KHz during the two CW only events, and nearly the entire band during the one SSB only event.) The use of frequencies below 1843 KHz during other SSB events causes much less disruption to those not participating in contests, who typically operate SSB above 1850 KHz. On the other hand, those interested in intercontinental communications are very often the same people operating SSB in the proposed affected frequency range during contest periods. They are still using the discussed segment for international communications, just with a different mode.

There is a potential conflict of interest element involved with this petition. One of the petitioners, Mr. Briggs, has in recent months built a vacation home with a significant amateur radio installation in Prince Edward Island, Canada. Should this petition be granted, in operating under Canadian regulations from that location he would be permitted to use SSB on those frequencies that would be prohibited to United States amateurs, sparing him from the considerable interference described in the petition.

The flexible frequency use of the 160 meter band has served well the vast majority of amateurs who use it. I urge the Commission to continue this flexible frequency usage, and deny this petition.